

## REMARKS

Claims 1-9 stand rejected under 35 U.S.C. 103(a) as being unpaentable over Suzuki (U.S. Patent No. 6,611,262) in view of Nakamura et al. (U.S. Patent No. 5,767,846). Claims 1-9 are pending.

The examiner has objected to the drawings for failing to show the verbal label corresponding to reference numbers described in the specification. In response, Applicant submits herewith replacement drawings for Figures 1 and 2.

With the submission of the replacement figures, applicant believes that the reason for the examiner's objection to the drawings has been overcome. Applicant respectfully requests the objection be withdrawn.

Reconsideration of the claims in view of the amendments and following remarks is respectfully requested.

A claimed invention is prima facie obvious when three basic criteria are met. First, there must be some suggestion or motivation, either in the reference themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the teachings therein. Second, there must be

a reasonable expectation of success. And, third, the prior art reference or combined references must teach or suggest all the claim limitations.

Amended independent claim 1 recites a telecommunications network comprising: a transmitter terminal including a multi-media scene description coder for producing a data stream which contains access points formed by coded data relating to a scene description, and a receiver terminal which may be connected at any instant to said transmitter terminal for receiving said data stream, wherein said transmitter terminal includes a storage memory for storing a first plurality of instants relating to a first description of a scene, and a second plurality of instants relating to a second description of the scene, the stored pluralities of instants for use at one or several later instants to form said access points. Amended Independent claims 2, 5 and 7 recites similar limitations.

Suzuki teaches a method for producing three dimensional space modeling data defined by a plurality of nodes and image/audio data specified by a position included in the nodes, which includes extracting a respective position from a node of the three dimensional space modeling data; converting the extracted position into a stream ID corresponding to image/audio data associated with the position; replacing the position with the stream ID; and multiplexing the image/audio data and three dimensional space modeling data including the stream ID to produce a bit stream. Thus, Suzuki teaches image/data corresponding to a single position and not a first

plurality of instants relating to a first description of a scene, and a second plurality of instants relating to a second description of the scene, the stored pluralities of instants for use at one or several later instants to form said access points.

Accordingly, the device of Suzuki fails to teach or suggest "a storage memory for storing a first plurality of instants relating to a first description of a scene, and a second plurality of instants relating to a second description of the scene, the stored pluralities of instants for use at one or several later instants to form said access points."

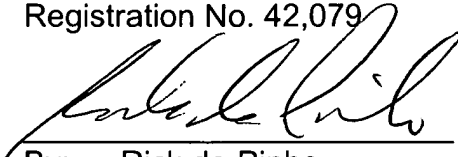
Applicants respectfully submits that Suzuki or Nakamura et al., alone or in combination, fails to teach, show or imply at least the limitation of a storage memory for storing a first plurality of instants relating to a first description of a scene, and a second plurality of instants relating to a second description of the scene, the stored pluralities of instants for use at one or several later instants to form said access points.

Dependent claims 3-4, 6 and 8-9 are likewise deemed to be patentable due to their dependency from the respective base claims, but should be examined in view of their additional limitations.

The applicants submit that the claims fully satisfy the requirements of 35 U.S.C. 103. In view of the foregoing remarks, favorable reconsideration and early passage to issue of the present application are respectfully solicited.

Respectfully submitted,

Dan Piotrowski  
Registration No. 42,079



By: Rick de Pinho  
Attorney for Applicant  
Registration No. 41,703

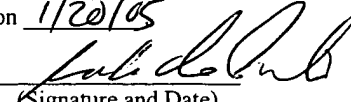
Date: January 20<sup>th</sup>, 2005

**Mail all correspondence to:**  
Dan Piotrowski, Registration No. 42,079  
US PHILIPS CORPORATION  
P.O. Box 3001  
Briarcliff Manor, NY 10510-8001  
Phone: (914) 333-9624  
Fax: (914) 332-0615

**Certificate of Mailing Under 37 CFR 1.8**

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to MAIL STOP **AMENDMENT**, COMMISSIONER FOR PATENTS, P.O. BOX 1450, ALEXANDRIA, VA. 22313 on 1/20/05

Rick de Pinho, Reg. No. 41,70  
(Name of Registered Rep.)

  
(Signature and Date)  
1/20/05